

MICHELE BECKWITH
Acting United States Attorney
J. DOUGLAS HARMAN
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TAEZON LAURECE SANDERSON,

Defendant.

CASE NO. 2:25-cr-00054-JAM

**STIPULATION AND ORDER TO EXCLUDE
TIME BETWEEN MAY 6, 2025, AND MAY 13,
2025**

DATE: May 6, 2025
TIME: 9:00 a.m.
COURT: Hon. John A. Mendez

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status conference on May 6, 2025.
2. By previous order, the court ordered time excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] through May 6, 2025.
3. On April 24, 2025, the court, on its own motion, issued an order vacating the status conference and resetting the status conference for May 13, 2025.
4. By this stipulation, the parties now move to **exclude time between May 6, 2025, and May 13, 2025, under Local Code T4.**
5. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case totals

1 many gigabytes of surveillance footage, cell phone data, and recording device footage. The
2 discovery also includes reports and other documents totaling over 1,000 pages related to
3 numerous distinct incidents. Discovery also included numerous photos. All of this discovery
4 has been either produced directly to counsel and/or made available for inspection and copying.

5 b) Counsel for defendant desires additional time to consult with his client, review
6 discovery, and discuss possible resolutions with his client.

7 c) Counsel for defendant believes that failure to grant the above-requested
8 continuance would deny him/her the reasonable time necessary for effective preparation, taking
9 into account the exercise of due diligence.

10 d) The government does not object to the requested exclusion.

11 e) Based on the above-stated findings, the ends of justice served by continuing the
12 case as requested outweigh the interest of the public and the defendant in a trial within the
13 original date prescribed by the Speedy Trial Act.

14 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
15 et seq., within which trial must commence, the time period of May 6, 2025 to May 13, 2025,
16 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
17 because it results from a continuance ordered on the court's own motion on the basis of the
18 Court's finding that the ends of justice served by taking such action outweigh the best interest of
19 the public and the defendant in a speedy trial.

20 6. Nothing in this stipulation and order shall preclude a finding that other provisions of the
21 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
22 must commence.

23 IT IS SO STIPULATED.

24 ///

25 ///

26 ///

27 ///

28 ///

1 Dated: April 25, 2025

MICHELE BECKWITH
Acting United States Attorney

2
3 /s/ J. DOUGLAS HARMAN
J. DOUGLAS HARMAN
Assistant United States Attorney

4
5
6 Dated: April 25, 2025

/s/ MICHAEL D. LONG
MICHAEL D. LONG
Counsel for Defendant
Taezon Laurece Sanderson

7
8
9
10
11 **ORDER**

12 IT IS SO ORDERED.

13
14 Dated: April 28, 2025

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE